MEMORANDUM

December 1, 1997

To: Jerry Kuhn

From: John Riekstins

Re: 0971900017 -- Lake County
Outboard Marine Corporation (OMC)
ILD000802827

November 25, 1997 - Site Visit

RCRA Log No. B-156
~~Permit~~ File

On November 25, 1997, a site visit was made to the OMC facility in Waukegan, IL to prepare for the "Technical Review" of OMC's RCRA Part B Permit Application. The following individuals participated in the visit:

Jerry Kuhn	**IEPA** Bureau of Land - Permit Section/RCRA Unit
John Riekstins	**IEPA** Bureau of Land - Permit Section/RCRA Unit
Kevin Lesko	**IEPA** Bureau of Land - Permit Section/RCRA Unit
Mara McGinnis	**IEPA** Community Relations

Anthony M. Montemurro - OMC Environmental Control Specialist (Main facility contact)
Lawrence E. Keller - OMC Associate Director of Environmental Affairs

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Trip was done in conjunction with a visit to BFI's Zion Landfill in the same general area.

The visit of the facility included tours of three (3) hazardous waste container storage (S01) areas, two (2) of which are currently permitted under existing USEPA RCRA Part B Permit and one (1) proposed area.

I. General Comments

(Original Permit issued by USEPA Sep. 30, 1983 - Permit last modified around 1990)

=> The facility is mainly a parts manufacturer for outboard marine engines. OMC corporate offices are located at this site. Waste streams generated from the manufacturing processes are summarized in Section C, pp. 2 & 3 of 11 (Attached) of the current Permit Application. Engine testing is also performed at the facility. Facility now produces parts for Johnson & Evinrude marine engines. Ficht (low emission engines) will in all likelihood be manufactured at a later date.

=> Wastes are/have been stored in drums, tote bins and cubic yard containers (cardboard boxes that are DOT approved for shipping).

=> Jerry Kuhn indicated that IEPA's Technical review would be completed in approximately six (6) months. OMC was advised not to change their current application until the Technical Review is completed.

=> The USEPA Permit authorized the use of two (2) S01 units (Storage Location 1a @ Plant No. 1 and Storage Location 2 @ Plant No. 2)

=> A combined maximum total of 1,520 drums (151,500 gall.) permitted for storage (From Part B currently in effect - New Part A lists Drums, Totes and Cubic Yard Containers as storage containers.)

=> @ Storage Location #1a (outdoor site near Plant # 1), process design capacity = 51,500 gallons (From current Part B.) Approximately 100' X 40'. Mostly skimmings from paint booth operations (solidified paint sludge material - mostly solid material) were stored in this area. Waste was manifested as a liquid due to inability to pass paint filter test). According to OMC, this area has not been used for waste storage since 1986.

No berms are present to contain any liquids that may be spilled. The area is adjacent to an area used for vehicle parking. 3 pictures taken from area.

=> @ Storage Location #2, an indoor site in the old smelter building - now called the Chemical Storage Building, process design capacity = 100,000 gallons (previous - process chemicals now occupy part of this area). Enclosed 200' X 80' area. Containment capacity = 59,840 gallons. According to OMC, this entire area was permitted for waste storage. Presently, only about 2/3 of building is designated for waste storage, while the remaining 1/3 is utilized for storage of process chemicals. OMC is requesting to permit only partial use of building for waste storage. The chemical storage area is separated from waste storage area by a fence.

=> **@ Storage Location 1b, OMC is seeking to store 12 cubic yards of waste in Cubic Yard Containers - this is an indoor location.** OMC is requesting to store dewatered F019 Wastewater Treatment Sludges from Plant No. 1 operations in this area.

Facility has 2 manufacturing plants (Plant No. 1 and Plant No. 2), each having a wastewater pretreatment system. Dewatered sludge is stored in one (1) cubic yard containers. According to OMC, these wastes (F019/D007 from Plant #2 and F019 from Plant #1) pass the paint filter test.

Sludge (dewatered) generated by Plant 1 wastewater treatment system is presently stored in the treatment system area @ Plant #1 for less than 90 days before being shipped off-site for disposal.

Sludge (dewatered) generated by Plant No. 2 wastewater treatment system and all other drummed wastes are stored at Plant No. 2 in the Chemical Storage Building before being shipped off-site for disposal.

OMC currently permitted to store up to 1,000 drums and 11 one (1) cubic yard sludge containers (57,222 gallons). Seeking to revise Permit to allow storage of 952 drums and 24 one (1) cubic yard sludge containers.

II. General comments from observed Hazardous Waste Management Units (Both Existing & Proposed):

Storage location #1a

=> is an outdoor site on the north side of Plant No. 1. It has a **process design capacity of 51,500 gallons. It is currently not being used. According to OMC, unit last used in 1986 for storage of hazardous wastes.**

Storage location #1b

=> is an indoor site in Plant No. 1 and has a **process design capacity of 12 one (1) cubic yard sludge containers - OMC is seeking to permit this area (unit not permitted under interim status).** OMC proposes to store wastes in cubic yard boxes on pallets. The pallets would straddle a grated trough. Any spills would be routed to the "head" of the treatment system.

Storage location #2

=> is the indoor site in Plant No. 2 in the Chemical Storage Building. It has a **process design capacity of 100,000 gallons.** The concrete floor has minor surface cracks and is protected by a sealer.

NOTE: OMC is seeking to permit the above 3 storage locations (#s 1a, 1b and 2) with their RCRA Part B Permit Application. They are requesting that wastes shown in Section C, pp. 2 & 3 of 11 (Attached) of the current Permit Application, be permitted to be stored in locations shown on attached Figure G-2, for > 90 days. This list will need to be updated to reflect current operating conditions.

Color photographs taken of various HWMUs will be furnished at a later date.

cc: Mara McGinnis

Section C
WASTE CHARACTERISTICS

C-1 CHEMICAL AND PHYSICAL ANALYSES

OMC Waukegan stores the following types of hazardous wastes in containers at their facility:

Waste Type	USEPA Hazardous Waste Number	Storage Location
1. Caustic Liquid	D002, D007	#2
2. Caustic Sludge	D002, D027, D030, D032	#2
3. Water Soluble Coolant	D032, D030	#2
4. Plating Baths	D002, D003, F007	#2
5. Plating Bath Sludge	D002, D003, F008	#2
6. Chromic Acid	D002, D007	#2
7. Plating Strippers	D002, F009	#2
8. Gasoline and Oil	D001	#2
9. Kerosene	D001, D030, D034	#2
10. Chromate Conversion Coating Liquid & Sludge	D002, D007	#2
11. Waste Oil Sludge	D030, D033	#2
12. Methylene Chloride	F002	#2
13. Paint	D001, D007	#2
14. Paint Residue	D001, D007, F003, F005	#1a, #2
15. Paint Thinner	D001, F003, F005, D030, D040	#2
16. Impregnating Solution	D030, D032	#2
17. Phosphate Ester Hydraulic Fluid	D001	#2
18. Petroleum Naptha Solvent	D034, D036, D033	#2
19. Solvent Cleaner (SK 105)	D039, D018	#2
20. Sovasol Solvent Cleaner	D001	#2
21. 1, 1, 1 Trichloroethane	F001, F002, D040	#2
22. Trichloroethylene	F001, F002, D040	#2
23. Wastewater Treatment Sludge (Plant No. 2)	F006, F019, D007	#2

Waste Type	USEPA Hazardous Waste Number	Storage Location
24. Wastewater Treatment Sludge (Pant No. 1)	F019	#1b
25. Water Soluble Die Lube	D028, D029, D040, D032	#2
26. Cyanide Sludge	D003	#2
27. Paint Filters	D007	#2
26. Petroleum Naptha Solvent	D001	#2

Storage location #1a is an outdoor site on the north side of Plant No. 1. It has a process design capacity of 51,500 gallons. It is not currently being used.
Storage location #1b is an indoor site in Plant No. 1, and has a process design capacity of 12 one cubic yard sludge containers.
Storage location #2 is the indoor site in Plant No. 2 in the Chemical Storage Building. It has a process design capacity of 100,000 gallons.

C-2 WASTE ANALYSIS PLAN

Hazardous Waste Determination

The following criteria are used to determine if a waste is considered hazardous:

A. It is listed in 40 CFR Part 261, Subpart D (35 Ill. Adm. Code, Subpart D).

B. It is not excluded from regulation as a hazardous waste under 40 CFR 261.4(b) (35 Ill. Adm. Code Section 721.104).

C. It exhibits any one of the following characteristics:

1) Ignitability: A waste exhibits the characteristic of ignitability if a representative sample of the waste has any of the following properties:

   a. It is a liquid, other than an aqueous solution containing less than 24% alcohol by volume, and has a flash point of less than 140°F (60°C).

   b. It is not a liquid and is capable, at a temperature of 25° C and a pressure of one atmosphere, of causing a fire through friction, absorption of moisture or spontaneous changes and when ignited, burns so vigorously and persistently that it creates a hazard.

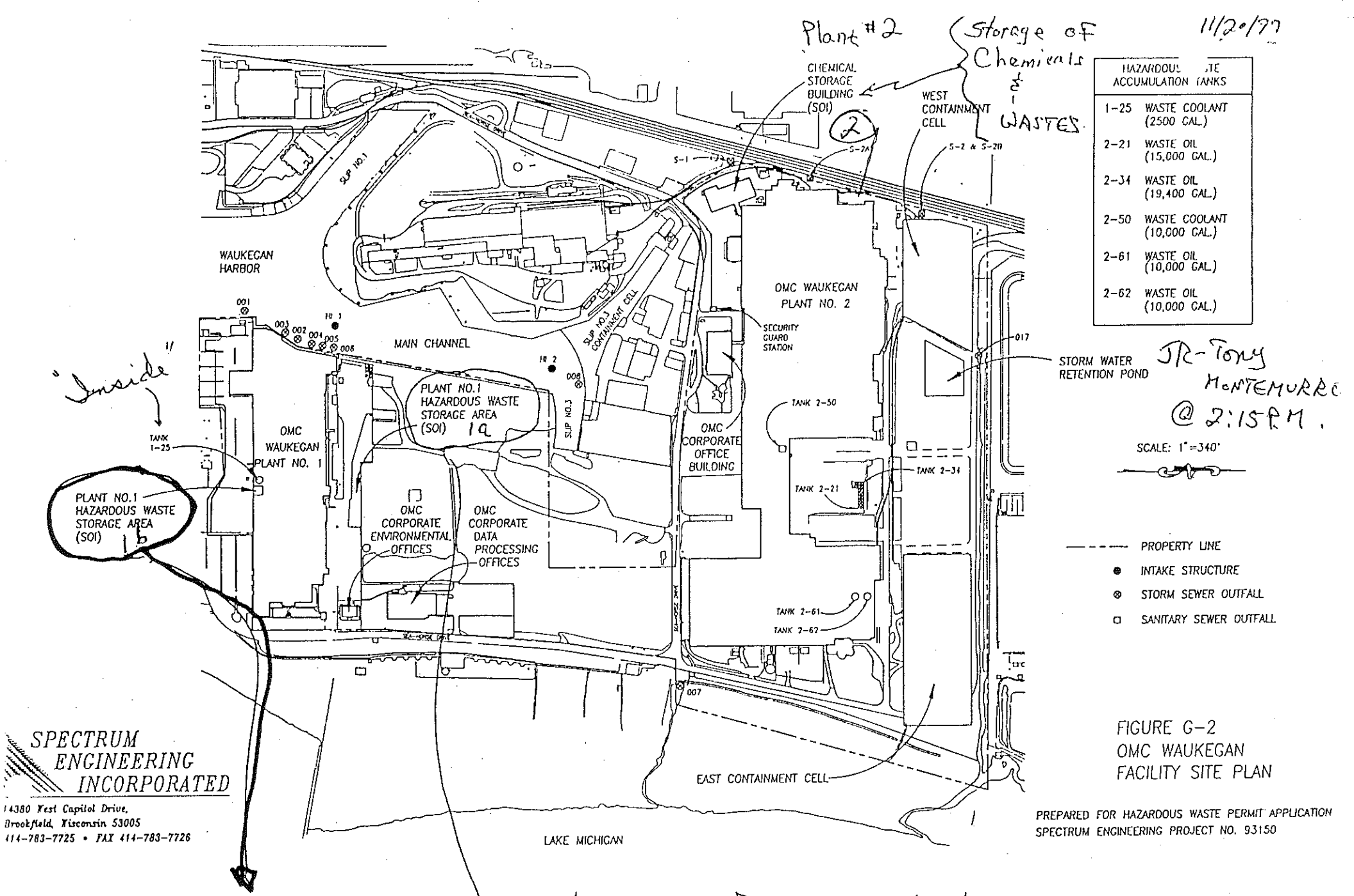

FIGURE G-2
OMC WAUKEGAN
FACILITY SITE PLAN

PREPARED FOR HAZARDOUS WASTE PERMIT APPLICATION
SPECTRUM ENGINEERING PROJECT NO. 93150

SPECTRUM ENGINEERING INCORPORATED
14380 West Capitol Drive,
Brookfield, Wisconsin 53005
414-783-7725 • FAX 414-783-7726

Johnson OUTBOARDS EVINRUDE OUTBOARDS OMC

OMC WAUKEGAN
A FACILITY OF OUTBOARD MARINE CORPORATION

Anthony M. Montemurro, CHMM
Environmental Control Specialist

90 Sea Horse Drive
Waukegan, IL 60085

Ph: 847/689-5363

OMC OUTBOARD MARINE CORPORATION

Lawrence E. Keller, P.E., CHMM
Associate Director
Environmental Affairs

190 Sea Horse Drive
Waukegan, IL 60085

Ph. 847/689-5620
Fax: 847/689-5684

4-13-92
0971900017-Lake
Outboard marine Corp
RCRA Permits

OMC-JOHNSON (ILD 000 802 827)

The OMC-Johnson facility (OMC) is located in Waukegan Harbor on the west shore of Lake Michigan in Waukegan, Illinois, about 37 miles north of Chicago. The harbor is irregularly shaped, with an area of about 37 acres. The two AOC's in the harbor are Slip No. 3 and the Upper Harbor. OMC manufactures marine products for recreational use. From about 1961 to 1972, OMC used a hydraulic fluid containing PCBs in its die-casting works. In 1976, high levels of PCBs were discovered in the soils and harbor sediments on site. It is estimated that there are over 700,000 pounds of PCBs located in the harbor and on site.

An observed release was scored for the ground-water route because of the PCB contamination in the on-site soils and aquifer below the facility. However, the ground water is only used as an industrial source of water.

An observed release was scored for the surface water route due to the widespread PCB contamination of the harbor. A drainage ditch leading from the site to the harbor is the pathway for this contamination. Lake Michigan is the area's main source of drinking water, and the nearest intake is inside the harbor. There is a state beach next to the OMC facility.

The air route score was based on the facility's operation of an air permit, and the extensive soil contamination that could impact the atmosphere through fugitive dust emissions. However, PCBs are nonvolatile and therefore pose a small threat to the air route.

The on-site soils route was based on extensive surface soil contamination throughout the facility. However, the facility is completely surrounded by a chain-link fence that prohibits any unauthorized intruders.

References:

PRC 1990. File of the OMC-Johnson Facility Oversight Project.